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Return Date: April 17, 2001
Time: 10:00 AM

Attorneys for Chinatrust Commercial Bank (New York Branch)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: Case Nos. 00-41065
RANDALL'S ISLAND FAMILY : through 00-41196 (SMB)
GOLF CENTERS, INC., et al., :
: (Jointly Administered)
Debtors. :
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**NOTICE OF MOTION BY CHINATRUST COMMERCIAL BANK (NEW YORK
BRANCH) COMPELLING RULE 2004 EXAMINATIONS OF JONATHAN
HACKER, ESQ. AND PHILIP J. GUND, COMPELLING THE RELEASE OF ITS
ADEQUATE PROTECTION PAYMENTS, GRANTING ITS CLAIM TO THE
CLOSING DEDUCTIONS AS AN ADMINISTRATIVE EXPENSE, AND
COMPELLING PAYMENT OF ALL INTEREST EARNED ON THE VALUE OF
ITS LIEN FOLLOWING THE CLOSING ON THE DENVER, COLORADO
PROPERTY**

TO: All parties and counsel of record on the attached Affidavit of Service

PLEASE TAKE NOTICE that on April 17, 2001, Chinatrust Commercial Bank (New York Branch) will seek an order of this Court: (1) compelling immediate payment of all adequate protection payments withheld by the Debtors, together with accrued interest thereon; (2) granting Chinatrust Commercial Bank (New York Branch)'s administrative claim relative to all authorized closing adjustments for the Denver, Colorado property deducted from the Seller's proceeds; (3) compelling payment of all

accrued interest earned on the delayed payment of Chinatrust Commercial Bank (New York Branch)'s lien by the Debtors from March 1, 2001 to March 19, 2001; (4) compelling the immediate Rule 2004 depositions of Jonathan Hacker, Esq. and Philip J. Gund; and (5) restraining all further disbursements by the Debtors as to the closing of the Denver property.

In support of this motion, Movants will rely on the memorandum of law attached.

A proposed form of Order is attached.

Respectfully submitted,

WONG ♦ FLEMING, P.C.

Attorneys for Chinatrust Commercial Bank (New York Branch)

By s/ James K. Haney
James K. Haney (JH-2539)

Dated: April 3, 2001
Edison, New Jersey